

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. PAUL ERICKSON, Defendant.	<p>4:19-cr-40015</p> <p>MOTION FOR CONTINUANCE</p>
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Defendant Paul Erickson, through his attorney of record, Clint Sargent, moves this Court for a continuance of the July 29, 2019 Jury Trial until on or after September 29, 2019, along with a corresponding continuance of all other dates and deadlines.

This is a complex case. The allegations in the indictment include conduct over a 22-year time frame from 1996 to 2018, involving multiple witnesses from dozens of states. Defense counsel has received production of approximately 1,500 pages of discovery from the Government. Due to the number of individuals involved, the volume of discovery, the nature of the prosecution, and the complex questions of fact and law, counsel is unable to adequately explore all options for resolution of this matter, prepare for pretrial proceedings or prepare for the trial itself within the time limits set by the Court's current scheduling order.

The Government, through Assistant United States Attorney Jeff Clapper, advises it has no objection to this Motion.

Additionally, AUSA Clapper and defense counsel are currently scheduled for a jury trial to commence on August 21, 2019 in the case of *United States v. Little*, 4:19-

CR-40009-KES. The Little case was previously set for trial in June, but postponed at the request of the Government due to the unavailability of a material witness. Mr. Little is in custody. It is expected by both parties that the Little case will be tried on August 21, 2019.

For all these reasons, Defendant is requesting at least a 60-day continuance of all dates and deadlines.

Mr. Erickson has authorized counsel to file this Motion. Defendant's Statement in Support of Postponement and Defendant's Supplemental Affidavit in Support of Postponement are filed herewith.

Dated this 1st day of July 2019.

/s/ Clint Sargent
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CERTIFICATE OF SERVICE

This is to certify that I have served a copy of the foregoing upon counsel using the ECF filing system which will automatically send e-mail notifications of such filing to opposing counsel, Jeff Clapper.

Dated this 1st day of July 2019.

/s/ Clint Sargent

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